



Attorneys At Law

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July 27, 2021

Via ECF

Honorable Mary Kay Vyskocil
United States District Court
Southern District of New York
500 Pearl Street, Room 2230
New York, NY 10007

USDC SDNY
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**RE: Building Service 32BJ Health Fund v. Sovereign Security, LLC.
No. 1:21-cv-4098-MKV-DCF**

Dear Judge Vyskocil:

My office represents Defendant Sovereign Security, LLC in the above matter. After meeting and conferring with Counsel for Plaintiff, Samuel Bloom, Esq., we jointly request a 30 day adjournment of the Rule 16 Initial Pretrial Conference, currently scheduled for August 3, 2021, in order to pursue settlement. Counsel believes the parties are close, and the additional time will help achieve a full resolution.

This is the first request of an adjournment or extension of time in this matter and is within the time set by the Court to request an extension or adjournment, *i.e.* before July 30, 2021. If granted, the required Joint 26(f) report will also be adjourned until one week before the new Rule 16 Conference is set. If the parties cannot reach a settlement, the new date for the initial conference will be on or after September 2, 2021.

Respectfully submitted,

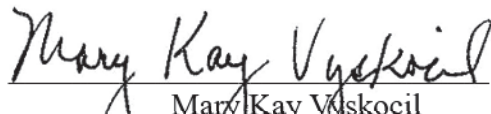

Richard P. Romeo
Attorneys for Defendant

cc: Via ECF and Email:
sbloom@rsgllp.com
Samuel Bloom, Esq.
Attorneys for Plaintiff

4815-9869-9251, v. 1

GRANTED. The Initial Pretrial Conference scheduled for August 3, 2021, at 1:00 PM is adjourned to September 14, 2021, at 10:00 AM. The parties shall file their joint letter and proposed Case Management Plan and Scheduling Order on or before September 7, 2021. SO ORDERED.

Date: 7/27/2021
New York, New York


Mary Kay Vyskocil
United States District Judge